

ENTERED

July 16, 2020

David J. Bradley, Clerk

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

TIAA-CREF INDIVIDUAL &
INSTITUTIONAL SERVICES, LLC,

Plaintiff,

v.

DAVID AHLQUIST,

Defendant.

Case No.: 4:20-cv-00917

**[ALTERNATIVE PROPOSED] ORDER GRANTING
DEFENDANT'S MOTION FOR RECONSIDERATION ON THE
ORDER GRANTING EXPEDITED DISCOVERY OR, IN THE ALTERNATIVE,
MOTION FOR EXPEDITED DISCOVERY ON BEHALF OF DEFENDANT**

AND NOW, this _____ day of _____, 2020, upon consideration of the moving
and responding papers, all supporting evidence, and arguments of counsel, the Court hereby
orders as follows:

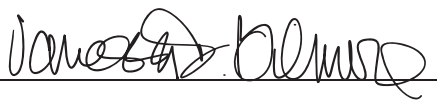
1. Defendant's, David Ahlquist, Motion for ~~Reconsideration on the~~ Order Granting Expedited
Discovery is GRANTED, ~~in part~~. as follows:
2. Defendant, David Ahlquist, is granted leave to conduct expedited discovery;
3. Within 48 hours of the service of this Order on TIAA, TIAA shall identify the individual
affiliated with TIAA who is most knowledgeable on:
 - a. Mr. Ahlquist's employment at TIAA; development of his client base; and
resignation from TIAA;
 - b. The reassignment of the clients that Mr. Ahlquist serviced at TIAA to other TIAA
financial advisors following Mr. Ahlquist's resignation;
 - c. Mr. Ahlquist's execution of the Confidentiality and Non-Solicitation Agreement
("Agreement");

- d. The facts supporting TIAA's claims for Breach of Contract and Misappropriation of Trade Secrets, asserted as Count I and Count II of the Complaint (Docket No. 1);
 - e. The facts relating to TIAA's alleged irreparable harm; and
 - f. Paragraph 2(a)-(e) of the Agreement.
4. The individual identified by TIAA in response to subparagraph (3) shall make himself or herself available to be deposed by no later than August 17, 2020;
 5. Mr. Ahlquist shall also have the right to depose Mr. Michael Lyons of TIAA. Mr. Lyons shall make himself available to be deposed no later than August 17, 2020;
 6. In advance of the depositions referred to above, Defendant, David Ahlquist, shall have the right to serve 10 requests for documents and 5 interrogatories on TIAA to be answered within seven (7) days of service.

~~7. The Court further orders:~~

IT IS SO ORDERED.

DATED: July 16, 2020

By: 
Hon. Vanessa D. Gilmore
United States District Judge
Southern District of Texas